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Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC, and
Bernard L. Madoff,

Plaintiff,

v.

KEN-WEN FAMILY LIMITED PARTNERSHIP;
KENNETH W. BROWN, in his capacity as a General
Partner of the Ken-Wen Family Limited Partnership;
and WENDY BROWN, in her capacity as a General
Partner of the Ken-Wen Family Limited Partnership,

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04468 (CGM)

Ref. Docket No. 181

Defendants.

**NOTICE OF FILING REVISED EXHIBITS TO DECLARATION OF
MICHAEL S. NEIBURG IN SUPPORT OF TRUSTEES' (I) OPPOSITION TO
DEFENDANT KENNETH W. BROWN'S MOTION FOR SUMMARY JUDGMENT,
(II) CROSS MOTION FOR SUMMARY JUDGMENT AS TO DEFENDANT
KENNETH W. BROWN AND (III) MOTION FOR SUMMARY JUDGMENT
AS TO DEFENDANT KEN-WEN FAMILY LIMITED PARTNERSHIP**

PLEASE TAKE NOTICE that on December 1, 2021, Irving H. Picard, as trustee ("Trustee") for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll, substantively consolidated with the chapter 7 estate of Bernard L. Madoff, filed the *Declaration of Michael S. Neiburg in Support of Trustee's (I) Opposition to Defendant Kenneth W. Brown's Motion for Summary Judgment, (II) Cross Motion for Summary Judgment as to Defendant Kenneth W. Brown and (III) Motion for Summary Judgment as to Defendant Ken-Wen Family Limited Partnership* [Docket No. 181] (the "Neiburg Declaration").

PLEASE TAKE FURTHER NOTICE, that attached to the Neiburg Declaration as Exhibit 11 were transcript excerpts for the deposition of Kenneth W. Brown taken January 27, 2020, and attached as Exhibit 24 were transcript excerpts from the deposition of Wendy W. Brown taken February 25, 2020.

PLEASE TAKE FURTHER NOTICE, that attached hereto as **Exhibit 11 (Revised)** is the full transcript of the deposition of Kenneth W. Brown taken January 27, 2020.

PLEASE TAKE FURTHER NOTICE, that attached hereto as **Exhibit 24 (Revised)**, is the full transcript of the deposition of Wendy W. Brown taken February 25, 2020.

[Signature page follows]

Dated: February 14, 2022
New York, New York

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

/s/ Michael S. Neiburg

Matthew B. Lunn

Michael S. Neiburg (admitted *pro hac vice*)

Justin P. Duda

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